

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

**THE STATE OF TEXAS, et al., §
§
§
Plaintiffs, §
§
v. § Civil Action No. 4:20-cv-00957-SDJ
§
GOOGLE LLC, §
§
§
Defendant. §**

**DEFENDANT GOOGLE LLC'S REDACTED FILING OF PLAINTIFFS' MOTION TO
EXCLUDE OPINIONS OF ITAMAR SIMONSON**

Pursuant to the Court's November 21, 2024 Order (ECF No. 685), Defendant Google LLC respectfully submits a redacted version of Plaintiffs' Motion to Exclude Opinions of Itamar Simonson and accompanying exhibits (ECF No. 673), which was filed under seal on November 18, 2024.

Please note that Plaintiffs' motion cites to and appends excerpts of the expert report of plaintiffs' expert Nancy Mathiowetz, which Plaintiffs have designated as Highly Confidential. Prior to this filing, Google emailed Plaintiffs to confirm whether there was any material in the Mathiowetz report that Plaintiffs wished to redact. Plaintiffs did not respond. As a result, and because it is unable to de-designate another party's highly confidential information unilaterally, Google is redacting references to the Mathiowetz report in Plaintiffs' motion, and keeping Exhibit C (excerpts of the Mathiowetz report) under seal.

Dated: November 25, 2024

Respectfully submitted,

FRESHFIELDS US LLP
/s/ Robert McCallum

Robert McCallum (*pro hac vice*)
3 World Trade Center
175 Greenwich St.
New York, NY 10007
Tel.: (212) 284-4910
rob.mccallum@freshfields.com

Eric Mahr (*pro hac vice*)
FRESHFIELDS US LLP
700 13th Street, NW
10th Floor
Washington, DC 20005
Tel.: (202) 777-4545
eric.mahr@freshfields.com

Kathy D. Patrick
GIBBS & BRUNS LLP
1100 Louisiana, Suite 5300
Houston, Texas 77002
Tel.: (713) 650-8805
kpatrick@gibbsbruns.com

ATTORNEYS FOR DEFENDANT GOOGLE LLC

CERTIFICATE OF SERVICE

I certify that on November 25, 2024, this document was filed electronically in compliance with Local Rule CV-5(a) and served on all counsel who have consented to electronic service, per Local Rule CV-5(a)(3)(A).

/s/ Robert McCallum
Robert McCallum